

1 **TANASI LAW OFFICES**  
2 RICHARD E. TANASI, ESQ.  
3 Nevada State Bar No. 9699  
4 8716 Spanish Ridge Ave., Suite 105  
5 Las Vegas, NV 89148  
p. (702) 906-2411  
f. (866) 299-5274  
rtanasi@tanasilaw.com

6 Attorney for Christian Contreras

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Case No. 2:16-cr-00044-JCM-BNW-1

11 Plaintiff,

12 **STIPULATION TO CONTINUE**  
13 **REVOCATION HEARING**  
(Fifth Request)

14 v.

15 CHRISTIAN CONTRERAS,

16 Defendant.

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Allison Reese, Assistant United States Attorney, counsel for the  
19 United States of America, and Richard Tanasi, newly appointed counsel for Defendant  
20 Christian Contreras, that that the Revocation Hearing currently scheduled on January 29,  
21 2024, (Doc. 101) be vacated and continued to a date and time convenient to the Court, but no  
sooner than thirty (30) days from April 8, 2024, which is the jury trial date for his new and  
pending criminal case. (See EM/CEF 2:22-CR-00278-CDS-DJA-1; Doc. 53.)

22 This Stipulation is entered into for the following reasons:

23 1) Defendant Christian Contreras was formally indicted in a new federal case on  
24 December 13, 2022. (See EM/CEF 2:22-CR-00278-CDS-DJA-1.) He is charged with one  
25 count of Carjacking in violation of 18 U.S.C. § 2119, one count of Discharging a Firearm  
26 During and in Relation to a Crime of Violence in violation of 18 U.S.C. § 924(c)(1)(A)(iii),

1 and one count of Prohibited Person in Possession of a Firearm in violation of 18 U.S.C. §  
2 922(g). (*Id.*, Doc. 1.)

3 2) A Superseding Indictment was filed on January 4, 2023 (*Id.*, Doc. 17.) and the  
4 arraignment for said Indictment was held on January 11, 2023 before the Honorable  
5 Magistrate Judge Nancy J. Koppe. (*Id.*, Doc. 20.) New counsel Richard Tanasi was appointed  
6 on August 15, 2023. (*Id.*, Doc. 41.) The trial in this pending case has been continued to April  
7 8, 2024. (*Id.*, Doc. 46.) Resolution of the trial case will affect the resolution of the pending  
8 revocation proceedings here.

9 3) A new counsel Richard Tanasi was also appointed in this instant case on August  
10 28, 2023. (*See* Doc. 99). Counsel needs additional time to review the discovery, visit with the  
11 defendant, and conduct investigation in this case to determine whether there are any issues  
12 that must be litigated and whether the case will ultimately go to a contested revocation  
13 hearing or will be resolved through negotiations.

14 4) The defendant is incarcerated and does not object to continuance.  
15 5) The parties agree to the continuance.  
16 6) The additional time requested herein is not sought for purposes of delay.

18 DATED this 23<sup>rd</sup> day of October 2023.

19 TANASI LAW OFFICES

20 By /s/ Richard Tanasi  
21 RICHARD TANASI, ESQ.  
Counsel for Defendant

JASON M. FRIERSON  
United States Attorney

By /s/ Allison Reese  
ALLISON REESE  
Assistant United States Attorney

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Case No. 2:16-cr-00044-JCM-BNW-1

Plaintiff,

V.

CHRISTIAN CONTRERAS,

Defendant.

## ORDER

---

Based on the Stipulation of counsel and good cause appearing, IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for Monday, January 29, 2024, at 10:30 a.m., be vacated and continued to **May 13, 2024, at 10:00 a.m.**

DATED October 30, 2023.

HONORABLE JAMES C. MAHAN  
UNITED STATES DISTRICT JUDGE